

Status of Passaic River CAG Technical Assistance September 18, 2013

Original CAG Request for Assistance

Final July 23, 2012 Request included:

- Phase I to identify range of reports, studies and information on dredging technologies and provide report and presentation. Also asked to review any bench scale tests done as part of 10.9 removal (none resulted in pilot phase).
- Phase II to look at any pilot tests (none done), identify any sediment decon facility permits in the region, more detailed review of any reports from phase I worthy of further study, and review FFS information.
- Ultimately seeking a summary report that compares the technologies (preferably in a side-by-side type of comparison), provide the following information at a minimum and clearly identify any gaps where data is missing or insufficient to make such determinations:
 - The potential for the technology to handle the volume and characteristics of the contaminated sediments in the Passaic River
 - Processing time and any key parameters or conditions that could affect the time or ability for the technology to succeed
 - Key logistical needs of the technology (including any unique transportation, equipment, and acreage for the decontamination facility(ies))
 - Time and other important considerations for mobilization and demobilization
 - Listing of potential emissions and by-products of each technology, including air pollution considerations and effectiveness of controls, percent volume that can be re-used, percent volume that requires disposal at both municipal and hazardous waste disposal facilities
 - Identify any beneficial end-products that are produced and their commercial viability
 - Make a recommendation on the overall suitability of each decontamination technologies to treat Passaic River sediments, and any important issues that should be considered in the remedy selection process.

TASC Timeline and Products Produced

8/28/12	CAG formal request for TASC support sent
10/22/12	Kick-off call with TASC team
Nov 2012	TASC team prepares schedule of technical assistance activities
1/7/2013	TASC review of CPG comments received
2/21/13	FFS excerpt provided to TASC
3/12/13	TASC technology summary tables received
4/11/13	TASC was to attend CAG meeting which was cancelled, no further interaction

Proposed TASC Support not yet Complete

The following tasks were identified in the TASC activities but not completed due to change in FFS schedule:

- Review FFS; summarize FFS in plain language; provide technical comments and recommendations to the CAG.
- Write summary fact sheets explaining remedial alternatives evaluated in the FFS
- Provide a qualitative evaluation of the potential long term (life cycle) impacts of each remedial alternative
- Recommend documents for community members interested in learning more about the selected remedial alternatives.
- Review Proposed Plan; provide technical comments and recommendations to the CAG.
- Assist with providing comments on the proposed plan, as needed.

TASC Issues Identified from CPG Comments to NRRB

1. The CPG indicates that EPA is not considering all relevant data. The CAG may want to review any available data that are not considered for the FFS. The CAG may want to discuss with EPA whether any data not considered are likely to affect the preferred remedy selected by EPA.
2. The CPG and EPA appear to have different opinions about the extent of natural recovery that is occurring and that may occur in the future. The CAG may want additional information about how natural recovery is estimated.
3. The CPG indicates that the model used by EPA does not adequately replicate existing conditions and it is likely to produce unreliable results. The CAG may want additional information about the model, assumptions and modeling process used by EPA.
4. The CPG indicated that EPA's dredging pilot study is flawed and likely to underestimate dredging production rates because the study failed to account for actual field conditions, such as bridge clearances. The CAG may want to obtain more information about the accuracy of predicted dredging production rates. *—what sources of data are available, including history on the Passaic?*
5. The CPG raises the issue of recontamination of the lower 8 miles of river from upstream sources. The 2007 Draft FFS does not discuss recontaminated by the upper 9 miles of river. The CAG may want to ask EPA if recontamination from upstream sources is probable.
6. The CPG disagrees with the statement on page 8 of EPA's stakeholder summary that resuspension of FFS Area sediments from tidal activity and scouring during high flow events is the primary ongoing source of contamination of the FFS study area. The CAG may want to ask EPA to further explain the data that supports EPA's conclusions about the source of contamination. The CAG may want to understand what, if any, assumptions EPA and the CPG are making to reach their different conclusions about the ongoing source of contamination.
7. The 2007 Draft FFS includes human health risk assessment from fish consumption, but there is no information about risk from other recreational activities. Is risk from fish consumption the main concern of the CAG? Are there other recreational activities, such as swimming, that are a concern? The CAG may want to ask if EPA can provide human health risk information for other recreational activities if knowing the risks would affect CAG input into the decision-making.
8. In a letter to the NRRB, the Baykeeper indicated the desire for a navigational channel for the lower Passaic River. The 2007 FFS discusses depths required for navigation for different sections of the lower 8 miles of the river. The CAG may want to discuss with EPA if and how the proposed remedy will accomplish both environmental cleanup and a navigational channel.
9. The CAG may want more information about how EPA's proposed cleanup alternatives for

the lower 8 miles of the river will affect daily life of the surrounding community. –*EJ Analysis*

CAG Feedback on TASC Tables Not Yet Incorporated

- Conduct an environmental justice analysis of some of the dredging and disposal options, including individual technologies
- Cost estimates of different options
- Any international examples?
- Table P.5, Treatment – Thermal Desorption – include temperatures
- Table P. 6, Vitrification – include temperatures; also include “community opposition” in third column
- In Table 3, please describe the modes or types of dredging that were done

EPA Materials Available

- What is and isn’t in the FFS, 5/23/13
- Draft FFS Report Table of Contents
- Draft FFS Appendices Table of Contents
- Draft RI Report Table of Contents
- Hudson County Letter and EPA Response
- RI-FFS Summary and Figures

PROPOSED NEXT STEPS

1. Conference call with Ana, Debbie, David, Wanda, Doug to discuss these actions and schedule
2. Send CAG comments on tables, schedule TASC to come to a CAG meeting to present and discuss tables
3. Revise and clarify scope of TASC support desired based on original request, TASC activities of 11/12 and TASC issues identified in CPG comment review
4. Ensure TASC has all available FFS material
5. Identify new work schedule based on December release date, identify all work that can happen ahead of release based on outstanding activities identified above